

**EXHIBIT**  
**A**

## ORAL AND VIDEOTAPED DEPOSITION OF CARLA COLLINS

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION  
C.M. COLLINS, N.J. LUNDY, §  
and R.C.L. MAYES, §  
Individually and on behalf §  
of all other similarly §  
situated, §  
§  
§  
Plaintiffs, §  
§  
VS. § NO. 4:22-cv-1073  
§  
CATASTROPHE RESPONSE UNIT, §  
INC. and CATASTROPHE §  
RESPONSE UNIT USA, INC., §  
§  
Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF  
CARLA COLLINS  
OCTOBER 19, 2023  
VOLUME 1

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## 1 APPEARANCES

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11 FOR THE DEFENDANTS CATASTROPHE RESPONSE UNIT,  
12 INC. AND CATASTROPHE RESPONSE UNIT USA, INC.:

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14 Ms. Kristen A. Laster  
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22 KBrumbalow@hallettperrin.com

## 23 ALSO PRESENT:

24 Ms. Cecili Morales  
25 Mr. David Repinski (via Zoom)  
Mr. Adam Dickens (via Zoom)  
Mr. John Hines, Videographer

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1 ORAL AND VIDEOTAPED DEPOSITION of CARLA  
2 MARIE COLLINS, produced as a witness at the instance  
3 of the Defendants, and duly sworn, was taken in the  
4 above-styled and numbered cause on the 19th of  
5 October, 2023, from 11:08 a.m. to 7:28 p.m., before  
6 Kathy E. Weldon, CSR in and for the State of Texas,  
7 reported by machine shorthand, at the offices of  
8 Hallett & Perrin, 1445 Ross Avenue, Suite 2400, in the  
9 City of Dallas, County of Dallas, State of Texas,  
10 pursuant to Notice and the Federal Rules of Civil  
11 Procedure.

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1 **over this dealership, agreed with me, and I was able**  
 2 **to get my down payment back.**

3 Q. The charges with regard to this matter, were  
 4 those dropped?

5 **A. Yes.**

6 Q. Okay. When I asked you about what criminal  
 7 matters you've been involved in, how come you didn't  
 8 mention any of this?

9 **A. I didn't remember. I forgot.**

10 Q. Let's talk about social media activity.

11 **A. Uh-huh.**

12 Q. You have a Facebook account, don't you?

13 **A. Yes.**

14 Q. In fact, you have multiple Facebook accounts,  
 15 don't you?

16 **A. Yes.**

17 Q. Under which names do you have Facebook  
 18 accounts?

19 **A. My name.**

20 Q. Okay. You have one under Carla Collins.

21 **A. Yes.**

22 Q. What else?

23 **A. Carla Marie.**

24 Q. Okay.

25 **A. And Shesus.**

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1 Q. I'm sorry?

2 **A. Shesus, S-H-E-S-U-S.**

3 Q. Is that supposed to be a play on Jesus?

4 **A. Shesus, She's us.**

5 Q. What does that mean, Shesus? Like, you're a  
 6 different version of Jesus?

7 **A. No.**

8 Q. Well, how did you get the name Shesus?

9 **A. She's us.**

10 Q. She is us.

11 **A. Yes.**

12 Q. She's one of us?

13 **A. Yes.**

14 Q. She's a person of the people?

15 **A. Yes.**

16 Q. I understand.

17 Q. Okay. Are those the only three Facebook  
 18 accounts you've ever had?

19 **A. Yes.**

20 Q. Are you active in Facebook?

21 **A. Yes.**

22 Q. What does "active" mean to you?

23 **A. Do I engage.**

24 Q. Yes.

25 **A. Do I make posts.**

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1 Q. How often do you make posts?

2 **A. Often.**

3 Q. How often?

4 **A. I -- I don't know the -- often.**

5 Q. Daily?

6 **A. No.**

7 Q. Weekly?

8 **A. Definitely weekly --**

9 Q. Okay.

10 **A. -- yes.**

11 Q. What are your posts about?

12 **A. Different things.**

13 Q. Yeah. Like what?

14 **A. Social injustice. I do -- whenever anyone in**  
 15 **the community reaches out to me to try to resolve the**  
 16 **matter, I act as the liaison. I work with multiple**  
 17 **police departments on trying to have a better**  
 18 **relationship with the community, specifically the**  
 19 **African-American community.**

20 I have helped them when they were looking  
 21 for persons who committed a crime, helping talk to  
 22 them to get them to turn themselves in. Help with  
 23 housing development, feeding those that are not able  
 24 or have a hard time feeding themselves, toy drive  
 25 giveaways.

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1 Q. Sounds like you do a lot for the betterment  
 2 of mankind.

3 **A. Yes.**

4 Q. Do you use it for social reasons as well?  
 5 I'm still talking about Facebook.

6 **A. Yes.**

7 Q. Like, what socially do you do?

8 **A. Respond to people who make comments.**

9 Q. Pictures? Videos?

10 **A. Yes. I put pictures, yes.**

11 Q. Pictures of you?

12 **A. Yes.**

13 Q. Videos of you, your family, your friends?

14 **A. Yes.**

15 Q. Do you have a Twitter account?

16 **A. Yes.**

17 Q. Under what name?

18 **A. No.**

19 Q. Okay.

20 **A. It's X.**

21 Q. I'm sorry?

22 **A. It's not Twitter.**

23 Q. You're right, it is X now.

24 Do you have an X account?

25 **A. Yes.**

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1 **A. Yes.**  
 2 Q. This is the one we're talking about.  
 3 **A. Yes.**  
 4 Q. This was in real-time, wasn't it?  
 5 **A. Yes.**  
 6 Q. Super.  
 7 And -- and by the way, that was during  
 8 the workday, a day in which you represented to CRU  
 9 that you worked the entire day?  
 10 **A. Yes. And I did. It's at 9:09.**  
 11 Q. Well, you weren't working straight from 8:00  
 12 to 6:00 or whatever hours you said you always worked,  
 13 right?  
 14 **A. Those are the -- I believe on this**  
 15 **deployment, it was on whichever one is --**  
 16 Q. 9:00 start time?  
 17 **A. After, because this is during the morning**  
 18 **meeting.**  
 19 Q. Yeah, I have no idea what you're saying right  
 20 now. Did this --  
 21 **A. So according --**  
 22 Q. Did this occur during the workday?  
 23 **A. Yes, it did.**  
 24 Q. Thank you.  
 25 **A. Can I elaborate on that?**

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1 Q. No, you may not.  
 2 **A. Oh, cool.**  
 3 Q. You continue to waste time and not answer my  
 4 questions.  
 5 MR. HURST: Thank you.  
 6 (Deposition Exhibit No. 13 was marked.)  
 7 Q. (By Mr. Hurst) I'm handing you what has been  
 8 marked as Exhibit No. 13 to your deposition. I will  
 9 represent to you, ma'am, that this is a series of  
 10 printouts of your Facebook activity on Monday, August  
 11 9, 2021, another day on which you represented to CRU  
 12 that you worked the entire day.  
 13 Do you recall Monday, August 9th, 2021?  
 14 **A. No.**  
 15 Q. Do you see on the first page a post you made  
 16 at 9:51 a.m. that day?  
 17 **A. Yes.**  
 18 **Q. Who's Ask Shesus?**  
 19 **A. That's a group.**  
 20 **Q. It's a Facebook group?**  
 21 **A. It's a group, yes.**  
 22 **Q. Is it not your Facebook group?**  
 23 **A. Yes. It was one I created.**  
 24 **Q. Aren't you Shesus?**  
 25 **A. Yes.**

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1 Q. When I asked you what Facebook accounts you  
 2 had earlier, you didn't mention Ask Shesus. Why not?  
 3 **A. I forgot because they're -- I forgot.**  
 4 Q. Okay. That is an honest answer. I believe  
 5 you.  
 6 Tell me what the purpose of Ask Shesus  
 7 is. It's a group comprised of you and other people?  
 8 **A. Yes.**  
 9 Q. Who else?  
 10 **A. I don't know.**  
 11 Q. You don't know who you formed a Facebook  
 12 group with?  
 13 **A. I formed the group and others joined.**  
 14 Q. Well, how many people are in the group?  
 15 **A. I don't know.**  
 16 Q. It's your group, isn't it?  
 17 **A. Yes, it is.**  
 18 Q. You don't know anyone who's in it; you don't  
 19 know how many are in it?  
 20 **A. I don't know how many are in it.**  
 21 Q. Do you know anyone else in it?  
 22 **A. Other people are in it, but I don't remember**  
 23 **all of their names.**  
 24 Q. Do you remember anybody's name who's in this  
 25 Facebook group you created called Ask Shesus?

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1 **A. No. Because it's not -- it's not even**  
 2 **active. I -- it's been a while since any activity has**  
 3 **been in the group.**  
 4 Q. Okay. Five minutes la- -- let's go to the  
 5 next page.  
 6 Five minutes later you post again, don't  
 7 you.  
 8 **A. Yes.**  
 9 Q. Ask Shesus is not a Facebook group, is it?  
 10 It's just an individual, you?  
 11 **A. Ask Shesus is a Facebook group.**  
 12 Q. It is?  
 13 **A. Yes.**  
 14 Q. It's not an individual like your other  
 15 Facebook accounts?  
 16 **A. No. It's a group.**  
 17 Q. And so you'd be able to click on Ask Shesus  
 18 and see everyone in the group?  
 19 **A. No.**  
 20 Q. Of course not.  
 21 **A. It's a private group.**  
 22 Q. I'm sorry?  
 23 **A. It's a group on -- this is a group on**  
 24 **Facebook.**  
 25 Q. Did you just say it was a private group?